

Before the  
Federal Communications Commission  
Washington, D.C. 20554

|   |   |                      |
|---|---|----------------------|
| In the Matters of                               | ) |                      |
|   | ) |                      |
| IP-Enabled Services                             | ) | WC Docket No. 04-36  |
|   | ) |                      |
| Implementation of Sections 255 and 251(a)(2)    | ) |                      |
| of The Communications Act of 1934, as           | ) |                      |
| Enacted by The Telecommunications Act of        | ) | WT Docket No. 96-198 |
| 1996: Access to Telecommunications Service,     | ) |                      |
| Telecommunications Equipment and Customer       | ) |                      |
| Premises Equipment by Persons with Disabilities | ) |                      |
|   | ) |                      |
| Telecommunications Relay Services and Speech-   | ) |                      |
| to-Speech Services for Individuals with Hearing | ) | CG Docket No. 03-123 |
| and Speech Disabilities                         | ) |                      |
|   | ) |                      |
| The Use of N11 Codes and Other Abbreviated      | ) | CC Docket No. 92-105 |
| Dialing Arrangements                            | ) |                      |

**REPLY COMMENTS OF VERIZON<sup>1</sup>**

The comments filed in response to the Commission’s Public Notice Seeking Comment make clear that the issues involved in making sure that calls from Voice over Internet Protocol (“VoIP”) customers who dial 711 to make an emergency call are directed to an appropriate PSAP, as required by Rule 64.604, are complex and challenging. Verizon does not object to AT&T’s and Sprint’s request that the waivers previously granted to TRS providers be made permanent, and comments here only to respond to Sprint’s apparent view that it has no responsibility to work toward a solution of these issues. As Verizon has explained previously, any solution to these issues, including the solution already implemented by Verizon, AT&T, and others, requires cooperative effort from many industry participants.

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<sup>1</sup> The Verizon companies participating in this filing (“Verizon”) are the regulated, wholly owned subsidiaries of Verizon Communications Inc.

Within the time frame specified by the Commission, Verizon developed the capability of routing 711 calls from VoIP customers with non-geographically relevant telephone numbers to the correct TRS center, based on the customer's Registered Location. Testing confirmed Verizon's ability to deliver calls to the appropriate TRS center, but also demonstrated that eight state TRS centers rejected calls with non-geographically relevant telephone numbers (which the system interpreted as "out of state" calls). To address this situation, Verizon reached out to all TRS providers and suggested that TRS centers establish distinct "800" numbers solely for receiving inbound VoIP calls. In this way, TRS Communications Assistants ("CAs") would know that all calls coming in through these numbers would be VoIP calls that should be accepted regardless of their phone number appearance. Also, using this method, CAs would know to query the caller for location information in the case of emergency calls. AT&T and two other TRS providers have provided toll-free numbers to which Verizon routes 711 calls. Sprint, however, has declined to do so.

Sprint argues that "providers of interconnected VoIP must modify the data stream that accompany the calls they send to TRS providers to include a unique information digit which would enable the TRS provider to identify the call as being a VoIP call." In addition, Sprint claims that "VoIP providers should also be required to either provide the TRS provider with the ANI that identifies the caller's actual location or at least ensure that the ALI databases include the most up-to-date registered location information of their subscribers."<sup>2</sup> But as Verizon has explained, VoIP providers cannot implement either solution on their own.<sup>3</sup> Instead the industry must work together to address these issues.

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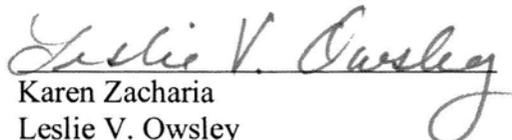
<sup>2</sup> Sprint Comments at 3-4.

<sup>3</sup> See, e.g., Reply Comments of Verizon, WC Docket No. 04-36, filed December 17, 2007; Petition of Verizon for Extension of Waiver, WC Docket No. 04-36, filed March 27, 2008 at 4-5.

As an example, inserting an information digit into the data stream will not be useful if a TRS center's equipment cannot read an information digit sent by a VoIP provider, or reads it but does not recognize what it means. Moreover, simply inserting an information digit into the data stream would not solve the problem that Verizon has encountered of TRS providers rejecting VoIP calls that bear non-geographically relevant phone numbers, unless TRS providers agree to accept calls that include the information digit regardless of telephone number. The Commission's rules makes clear that TRS providers are responsible for routing emergency VoIP 711 calls to the appropriate PSAP.<sup>4</sup> Given the clear role that TRS providers themselves must play in achieving that result, the Commission should reject Sprint's argument that VoIP providers alone must solve the TRS providers' issue.

Respectfully submitted,

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<sup>4</sup> 47 C.F.R. § 64.604(a)(4).